

**UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
WACO DIVISION**

**NEODRON LTD.,**

**Plaintiff,**

**v.**

**SAMSUNG ELECTRONICS CO., LTD.  
AND SAMSUNG ELECTRONICS  
AMERICA, INC.**

**Defendants,**

**Civil Action No. 6:19-cv-00400-ADA**

**DEFENDANTS SAMSUNG ELECTRONICS CO., LTD AND SAMSUNG  
ELECTRONICS AMERICA INC.'S UNOPPOSED MOTION FOR EXTENSION OF  
TIME TO RESPOND TO PLAINTIFF'S COMPLAINT**

Defendants Samsung Electronics Co., Ltd. ("SEC") and Samsung Electronics America, Inc. ("SEA", collectively with SEC "Samsung") file this unopposed motion for extension of time to answer or otherwise respond to Plaintiff Neodron Ltd's ("Plaintiff") Complaint (Dkt. No. 1).

Plaintiff filed its Complaint on June 28, 2019 (Dkt. No. 1). Plaintiff filed an executed summons with the Court on July 11, 2019, indicating service on the domestic defendant, SEA, occurred on July 8, 2019 (Dkt. No. 8). Assuming that service on SEA was proper, SEA's deadline to respond would be July 29, 2019. The foreign defendant, SEC, has not yet been served. Pursuant to Federal Rule of Civil Procedure 4, if SEC were to waive service today, it would have 90 days to respond to the complaint.

Samsung has retained O'Melveny & Myers LLP as counsel. The undersigned counsel for Samsung conferred with Plaintiff's counsel on July 11, 2019 to request a courtesy extension to 90 days from today (*i.e.*, an extension of 73 days) for SEA to answer or otherwise respond to

Plaintiff's Complaint in exchange for agreeing to waive service on behalf of the foreign defendant, SEC, such that the response date for SEA and SEC would be the same. Plaintiff's counsel confirmed that they do not oppose the requested extension.

Samsung therefore respectfully requests an extension of time up to and including October 10, 2019, to answer or otherwise respond to the Complaint. No prior extension of time has been requested.

Accordingly Samsung respectfully requests that the Court issue the attached proposed order extending Samsung's time to answer or otherwise respond to Plaintiff's complaint to October 10, 2019.

Dated: July 12, 2019

Respectfully submitted,

/s/ Ryan K. Yagura

Ryan K. Yagura (Tex. Bar No. 24075933)

ryagura@omm.com

O'MELVENY & MYERS LLP

400 S. Hope Street

Los Angeles, CA 90071

Telephone: 213-430-6000

Facsimile: 213-430-6407

*Counsel for Defendants Samsung Electronics Co.,  
Ltd. and Samsung Electronics America, Inc.*

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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(b)(1) on July 12, 2019.

/s/ Ryan K. Yagura

**CERTIFICATE OF CONFERENCE**

This is to certify that counsel for Plaintiff and counsel for the Defendants complied with the meet and confer requirements of CV-7 on July 12, 2019 and Plaintiff does not oppose this motion.

/s/ Ryan K. Yagura